

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**UNITED STATES OF AMERICA,**

**v.**

**MICHAEL L. MCDONALD,**

**Defendant.**

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**CRIMINAL CASE NO. GLR 21-444**

**...ooOoo...**

**MOTION TO UNSEAL INDICTMENT**

The United States of America, by its undersigned attorneys, for the following reasons, moves this Honorable Court to order and direct that the indictment in the above-captioned case be **UNSEALED**. The defendant has been arrested and it is no longer necessary for the indictment to remain under seal.

WHEREFORE, the government respectfully requests that the indictment be unsealed.

Respectfully submitted,

Erek L. Barron  
United States Attorney

By: \_\_\_\_\_

Kathleen O. Gavin  
Assistant United States Attorney

It is so ORDERED, this 3<sup>rd</sup> day of December, 2021.



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Honorable J. Mark Coulson  
United States Magistrate Judge